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**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

ROSAURA DERAS, individually and on  
behalf of a class of similarly situated  
individuals,

Plaintiffs,

vs.

VOLKSWAGEN GROUP OF AMERICA,  
INC.,

Defendant.

Case No.: 17-cv-05452- JST

**AND ORDER  
STIPULATION, CONTINUING CASE  
MANAGEMENT CONFERENCE**

**Judge: Jon S. Tigar**

1 WHEREAS on September 20, 2017, Plaintiff Rosaura Deras ("Plaintiff") filed her  
2 Complaint;

3 WHEREAS on November 13, 2017, pursuant to a stipulated extension of time, Defendant  
4 filed a motion to dismiss Plaintiff's Complaint;

5 WHEREAS on November 24, 2017, Plaintiff filed a First Amended Complaint;

6 WHEREAS, pursuant to a stipulated extension of time, Defendant filed a motion to  
7 dismiss the First Amended Complaint on January 15, 2018;

8 WHEREAS on May 16, 2018, the Court *sua sponte* continued the Case Management  
9 Conference that was scheduled for May 23, 2018 to July 18, 2018, due to the court's  
10 forthcoming order on Defendant's motion to dismiss;

11 WHEREAS on May 17, 2018, the Court issued its Order granting in part and denying in  
12 part Defendant's motion to dismiss;

13 WHEREAS because counsel for Defendant has a prior travel commitment prior to and on  
14 July 18, 2018, counsel for all parties have agreed, subject to the Court's approval, to continue the  
15 July 18, 2018 Case Management Conference to July 25, 2018, or if that date is not available, to  
16 such other date thereafter that is convenient to the Court;

17 WHEREAS the agreed-to continuance will not prejudice any party, nor will it otherwise  
18 alter the date of any event or deadline already fixed by Court order, and this stipulated request is  
19 being filed at least 14 days before the scheduled conference as required by Rule 6-1(b) of the  
20 Local Civil Rules of the United States District Court for the Northern District of California;

21 THEREFORE, pursuant to Civil L.R. 6-1(b) and 6-2, it is hereby stipulated by and  
22 between Plaintiff and Defendant, through their respective counsel, that the Case Management  
23 Conference be continued to July 25, 2018, or if that date is not available, to such other date

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thereafter that is convenient for the Court, and that the July 11, 2018 date for filing an updated Joint Case Management Statement be adjusted accordingly.

**IT IS SO STIPULATED.**

Dated: May 17, 2018

HERZFELD & RUBIN P.C.

By: /s/ Michael Gallub  
Michael B. Gallub (*Pro hac vice*)  
Attorney for Defendant,  
VOLKSWAGEN GROUP OF AMERICA,  
INC.

Dated: May 17, 2018

THE LAW OFFICE OF STEPHEN M. HARRIS,  
P.C.


By: /s/ Stephen M. Harris  
Stephen M. Harris (SBN 110626)  
Attorney for Plaintiff,  
ROSAURA DERAS

**PURSUANT TO STIPULATION, IT IS SO ORDERED:**

The Case Management Conference is continued to August 1, 2018.

The Parties shall file an updated Joint Case Management Statement by July 23, 2018.

Dated: May 21, 2018

  
Honorable Jon S. Tigar  
United States District Court Judge